

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEMETRIA POWELL, as guardian *ad litem* and on behalf of her son D.P. et al., )  
Plaintiffs, ) No. 18 CV 6675  
v. ) Judge Joan B. Gottschall  
The State of Illinois et al., )  
Defendants. )

**PLAINTIFFS' MOTION TO VOLUNTARILY WITHDRAW  
DEMETRIA POWELL AS PLAINTIFF**

Plaintiff Shanice Matthews, as guardian *ad litem* and on behalf of her son, D.W., and plaintiff Demetria Powell, as guardian *ad litem* and on behalf of her son, D.P., by their undersigned counsel, respectfully move for leave for Demetria Powell on behalf of her son to withdraw from this action and for her claim to be dismissed without prejudice, as she has moved to another city. Accordingly, the sole plaintiff will be Shanice Mathews as guardian *ad litem* and on behalf of her son, D.W. No additional plaintiff will be joined, and so no new factual allegations or further amendment of the complaint will be necessary. The renewed motion to dismiss is fully briefed and at issue, and without objection by defendants, the case may continue to proceed on that basis. In support of this motion plaintiffs state:

1. Demetria Powell and her son, D.W., have moved to Milwaukee Wisconsin and are no longer members in the proposed class of children living in high crime Chicago neighborhoods.
2. The remaining plaintiff, Shanice Matthews, as guardian *ad litem* and on behalf of her son, D.W., as set forth in the Second Amended Complaint, continues with her own claims and

will be an adequate class representative. For that reason, plaintiffs respectfully submit that there is no need for an amended complaint.

3. Previously, on November 12, 2019, before Shanice Matthews joined the case, Demetria Powell as the sole plaintiff at that time filed a motion to certify the class pursuant to Rule 23(b)(2), F.R.Civ.P.

4. In no less than seven days, plaintiff Shanice Matthews will file a revised motion to certify the class specific to her as the class representative.

5. Defendants have no objection to this motion for the withdrawal of plaintiff Powell.

WHEREFORE, plaintiffs request that this Court approve the withdrawal of the claims of Demetria Powell as guardian *ad litem* and on behalf of her son, D.P.

Respectfully submitted,

Dated: May 10, 2022

By: s/ Thomas H. Geoghegan  
One of Plaintiffs' Attorneys

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